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Attorney for Plaintiff,
Jose Escobedo

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOSE ESCOBEDO,)	Case No. 1:24-cv-00590-SKO
)	
Plaintiff,)	SECOND STIPULATED REQUEST FOR
)	MODIFICATION OF SCHEDULING
vs.)	ORDER; ORDER
)	
CASA CORONA FOODS, INC dba CASA)	(Doc. 36)
CORONA, et al.,)	
)	
Defendants.)	
)	

Plaintiff, Jose Escobedo (“Plaintiff”), and Defendants Casa Corona Foods, Inc, Casa Foods Incorporation, and Cedar Pointe Investors, LP (“Defendants”), the parties to this Action, through their respective attorneys of record, hereby stipulate as follows:

1. A Scheduling Order was issued in this matter on August 23, 2024 (Dkt. 26), setting, among other dates and deadlines, a fact discovery cutoff of March 14, 2025.

2. The Parties previously requested, and the Court granted, a modification of the Scheduling Order whereby the fact discovery cutoff was extended to March 21, 2025 for the sole purpose of taking Defendants’ depositions, because Defendants were not available on the originally noticed date of March 12, 2025 (Dkt. 34). Defendants selected a new date of March 21, 2025 for their depositions, and stipulated that the depositions would take place on such date.

SECOND STIPULATED REQUEST FOR MODIFICATION OF SCHEDULING ORDER; ORDER

1 3. On March 21, 2025, Plaintiff filed a Notice of Settlement as to Defendants Casa
2 Corona Foods, Inc and Casa Foods Incorporation (Dkt. 35).

3 4. Landlord Cedar Pointe Investors, LP (“Landlord”), is not available for deposition
4 on March 21, 2025.

5 5. Additionally, the Landlord has yet to produce responses to Plaintiff’s written
6 discovery requests, consisting of requests for admission, requests for production of documents,
7 and special interrogatories.

8 6. The Landlord has agreed to serve complete responses to Plaintiff’s written
9 discovery requests no later than March 28, 2025.

10 7. Pursuant to Federal Rule of Civil Procedure 16(b)(4), the Parties jointly request
11 a further modification of the Scheduling Order in this matter issued on August 23, 2024 (Dkt.
12 26), as modified on March 12, 2025 (Dkt. 34), such that the fact discovery cutoff be extended to
13 April 4, 2025 for the limited purpose of taking the depositions of the Landlord’s person(s) most
14 knowledgeable. The Parties stipulate that the Landlord’s deposition will take place by Zoom
15 commencing at 9:00 a.m. on April 4, 2025.

16 8. Additionally, the Parties stipulate that the Landlord’s complete responses to
17 Plaintiff’s requests for admission, requests for production of documents, and special
18 interrogatories will be produced by email no later than March 28, 2025. Plaintiff does not waive
19 the right to challenge any objections on the basis of untimeliness.

20 9. This limited-purpose extension will not affect other dates or deadlines set by the
21 Scheduling Order.

22 **IT IS SO STIPULATED.**

23
24 Dated: March 21, 2025

MOORE LAW FIRM, P.C.

25
26 /s/ Tanya E. Moore

Tanya E. Moore

27 Attorney for Plaintiff,

28 Jose Escobedo

SECOND STIPULATED REQUEST FOR MODIFICATION OF SCHEDULING ORDER; ORDER

1 Dated: March 21, 2025

McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
LLP

3 /s/ David L. Emerzian

4 David L. Emerzian
5 Attorneys for Defendants,
6 Casa Corona Foods, Inc. dba Casa Corona
7 and Casa Foods Incorporation dba Casa
8 Corona

8 Dated: March 21, 2025

REDEN | RIDDELL

9 /s/ Justin G. Reden

10 Justin G. Reden
11 Attorneys for Defendant,
12 Cedar Pointe Investors, LP
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SECOND STIPULATED REQUEST FOR MODIFICATION OF SCHEDULING ORDER; ORDER

ORDER

The Parties having so stipulated, (Doc. 36), and good cause appearing,

IT IS HEREBY ORDERED that the Scheduling Order in this matter issued on August 23, 2024, (Doc. 26), as modified on March 12, 2025, (Doc. 34), is **MODIFIED** to **EXTEND** the fact discovery cutoff to April 4, 2025, for the limited purpose of taking the depositions of the Landlord Cedar Pointe Investors, LP's person(s) most knowledgeable on April 4, 2025.

IT IS SO ORDERED.

Dated: **March 24, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE